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May 27, 2022

VIA ECF

Honorable John G. Koeltl
United States District Court
Southern District of New York
500 Pearl Street
New York, New York 10007

Re: *Xiamin Zeng v. City of New York, et al.*,
19 Civ. 3218 (JGK) (KHP)

Your Honor:

I am an Assistant Corporation Counsel in the Office of Hon. Sylvia O. Hinds-Radix, Corporation Counsel of the City of New York, and attorney for defendants City of New York, Detective Danielle Febus, and Police Officer Erlene Wiltshire in the above-referenced matter. Pursuant to the Court's April 29, 2022 Order (Docket Entry No. 87), I write jointly with plaintiff's counsel, Sameer Nath, to provide a report on the parties' Rule 26(f) conference.

On May 25, 2022 and May 27, 2022, plaintiff's counsel and I met and conferred via telephone to discuss outstanding discovery. During those meet and confers, the undersigned provided plaintiff's counsel with a timeline of discovery productions made by defendants:

- On August 26, 2019, defendants served initial disclosures pursuant to Fed. R. Civ. P. 26(a) and Local Civil Rule 83.10, section 5(a);
- On September 5, 2019, defendants served supplemental limited discovery;
- On September 16, 2019, defendants served first supplemental disclosures;
- On October 29, 2019, defendants served second supplemental disclosures;
- On November 22, 2019, defendants served third supplemental disclosures; and
- On April 22, 2021, defendants served fourth supplemental disclosures.

Today, May 27, 2022, I provided plaintiff's counsel with copies of all of the abovementioned disclosures that were previously served on plaintiff or plaintiff's prior counsel.

On April 30, 2020, defendants served a notice of plaintiff's deposition and their first set of interrogatories and request for production of documents to plaintiff. On July 8, 2020, plaintiff served her responses and objections thereto. On August 17, 2020, defendants served responses and objections to plaintiff's document requests and interrogatories. On the date of this writing, I provided copies of the abovementioned discovery requests and responses to plaintiff's counsel.

Plaintiff requests one week — until June 3, 2022 — to review the materials reproduced by defendants and, if necessary, to serve any additional discovery requests. Defendants, without waiving any objections, consent to that request. Otherwise, documentary discovery is complete. Aside from any discovery requests that plaintiff may serve on or before June 3, 2022, the parties agree that fact discovery will be complete once depositions are completed. Accordingly, the parties propose that the Court set the close of all fact discovery for August 5, 2022, by which date the parties will complete all depositions.

We thank the Court for its consideration herein.

Respectfully submitted,



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